

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

QUANTUM TECHNOLOGY  
INNOVATIONS, LLC,

Plaintiff,

v.

SHOWTIME NETWORKS INC.,  
SHOWTIME DIGITAL INC., AND  
PARAMOUNT GLOBAL,

Defendants.

Civil Action No. 24-cv-1103

**NOTICE OF DEFENDANTS' MOTION  
TO DISMISS AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that pursuant to Local Civil Rule 7.1, Defendants Showtime Networks Inc., Showtime Digital Inc., and Paramount Global (collectively, "Defendants"), by their undersigned attorneys, on a date and time to be determined by the Court, will and hereby does respectfully move this Court at the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York for an Order granting its Motion to Dismiss the Amended Complaint of Plaintiff Quantum Technology Innovations, LLC for failure to state a claim under Fed. R. Civ. P. 12(b)(6).

This Motion is based upon this Notice of Motion, the accompanying Memorandum in support thereof, accompanying Second Declaration of Michael H. Jones, the Court's files in this action, any matter judicially noticeable, and such other documents, arguments, and matters as may come to the attention of the Court.

Dated: June 24, 2024

Respectfully submitted,

By: /s/ Sharon L. Davis  
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